

KURTIS & ASSOCIATES, P.C.

SUITE 200
1000 POTOMAC STREET, N.W.
WASHINGTON, D.C. 20007

—
(202) 328-4500
TELECOPIER (202) 328-1231

August 1, 2003

Via Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Public Service Cellular, Inc. and Enterprise Wireless PCS, L.L.C.
E911 Interim Report
In the Matter of Revision of the Commission's Rules to Ensure Compatibility
With Enhanced 911 Emergency Calling Systems
CC Docket No. 94-102

Dear Ms. Dortch:

On behalf of Public Service Cellular, Inc. and Enterprise Wireless PCS, L.L.C. (together "the Companies") we hereby submit their report on the status of their implementation of E911 services. The Companies are Tier III carriers as defined in *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay (rel. July 26, 2002), FCC 02-210(2002)(*Non-Nationwide Carrier Order*). This report is submitted in compliance with the terms of the *Non-Nationwide Carrier Order*.

If you have any questions or require additional information with respect to the Interim Report, please do not hesitate to call.

Best regards,

/s/ Joshua P. Zeldis

Joshua P. Zeldis

Enclosures

cc: Qualex International (FCC Copy Contractor)

KURTIS & ASSOCIATES, P.C.

SUITE 200
1000 POTOMAC STREET, N.W.
WASHINGTON, D.C. 20007

—
(202) 328-4500
TELECOPIER (202) 328-1231

Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Wireless Enhanced 911 Deployment and Implementation, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

Public Service Cellular, Inc. ("Public Service" or "PSC") and Enterprise Wireless PCS, L.L.C. ("Enterprise") (together "the Companies"), by their attorneys, pursuant to the Federal Communications Commission's ("Commission") *Non-Nationwide Carrier Order*¹ and *Public Notice*² in CC Docket No. 94-102, hereby file an Interim Report, detailing their efforts towards attaining the benchmarks established in the *Non-Nationwide Carrier Order* and with other applicable provisions of the wireless Enhanced 911 ("E911") rules.

In its *Non-Nationwide Carrier Order*, the Commission granted a temporary stay to select carriers from the application of certain specific E911 Phase II deadlines set forth in section 20.18(f) and (g) of the Commission's rules.³ In order to assist in monitoring Tier III carriers' E911 deployment progress, the Commission required that Tier III carriers file an Interim Report to provide specific, verifiable information to allow the Commission to track compliance with each of the benchmarks listed above. In compliance with the *Non-Nationwide Carrier Order*, the Companies now file this instant report with the Commission.

I. Carrier Background

Public Service provides analog and TDMA digital CMRS wireless service in the Columbus, GA/ AL MSA; Georgia 6 – Spalding; Alabama 5 – Cleburne; Alabama 8 – Lee; Georgia 5 – Haralson; and Georgia 9 – Marion RSAs; and digital services in Anderson, SC; Anniston, AL; and Columbus, GA BTAs.⁴ Enterprise provides broadband Personal

¹ In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Non-Nationwide Carrier Order*, CC Docket No. 94-102, Order to Stay (rel. July 26, 2002), ("*Non-Nationwide Carrier Order*").

² Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carrier, Public Notice, CC Docket No. 94-102, (rel. June 30, 2003) ("*Public Notice*").

³ The Companies were identified as Tier III carriers and were included in the list of non-nationwide carriers granted a temporary stay. *See, Non-Nationwide Carrier Order*, ¶ 23 and Appendix A.

⁴ Stations KNKA415 (CMA153B), KNKN872 (CMA376B1), KNKN913 (CMA376B2), KNKN883 (CMA376B3), KNKN687 (CMA311B2), KNKN932 (CMA314B2), KNKN934 (CMA375B2), KNKN976 (CMA379B1), KNLG210 (BTA016F), KNLH422 (BTA017D), and KNLH421 (BTA092F).

Communications Service (“PCS”) in the Dothan, AL; Opelika, AL; Albany, GA; and LaGrange, GA BTAs, also utilizing the TDMA protocol.⁵

II. E911 Deployment

A. Phase I

Public Service Cellular and Enterprise have implemented E911 Phase I in the following areas: Columbus, GA; Calhoun County, Alabama; Dougherty County, Georgia; Anderson County, South Carolina; Chambers County, Alabama; Lee County, Alabama; Troup County, Georgia; Russell County, Alabama; Harris County, Georgia; Dale County, Alabama; Houston County, Alabama; and Lee County, Georgia. There are no outstanding E911 Phase I requests.

B. Phase II

Pubic Service received an E911 Phase II requests from the Ozark-Dale County, Alabama E-9-1-1 and the Calhoun County, Alabama PSAP. Both PSAPs have formally withdrawn their requests once Public Service explained the limitations of its current TDMA network and the inability to triangulate from its network as currently deployed. Public Service has committed to work with both PSAPs to coordinate the overbuild of PSC’s network and the deployment of E911 Phase II equipment in conjunction with that overbuild.

C. E911 Equipment Order/Installation Status

Pubic Service and Enterprise currently use TDMA technology but are planning to migrate to GSM technology. The Companies are not aware of any handset vendor that is providing either a TDMA or a GSM ALI-capable handset. Accordingly the only option at this point in time would be a network-based solution. However, PSC does not believe that the network-based solution will be able to meet the FCC’s accuracy requirements.

The Companies are in the process of overlaying, and ultimately replacing, its TDMA infrastructure with GSM technology. Due to the considerable high cost of overlaying its infrastructure, the Companies have planned the migration to GSM in four phases for the Companies’ core markets. The first two phases will begin in December of 2003, with the last two phases in its core markets and deployment in its 1900 MHz PCS expansion markets following thereafter.

The Companies anticipate that, after the transition from TDMA to GSM, they will be able to provide E911 Phase II service in their markets within six months after a valid request is received from a PSAP although they are not confident that the current technology will allow for a deployment that meets the FCC accuracy requirements.

^{5/} Stations KNLF545 (BTA115), KNLF546 (BTAB334), KNLF547 (BTA237) KNLF548 (BTAB006).

D. Difficulties in Implementation

The Companies are not confident that they will be able to achieve the Commission's Phase II accuracy standards. This concern centers around the fact that rural deployments, such as these lack the requisite cell site density to enable network-based solutions to provide sufficient triangulation. In many cases, coverage is provided from a single cell site with only sufficient overlap to allow for reliable call hand-offs. Along major rural highways, cell sites are often laid out in a "string of pearls" affording little opportunity for any meaningful triangulation to occur. System modification to provide sufficient accuracy with current network-based solutions would appear to require the construction of numerous additional cell sites which would not be economically feasible. Accordingly, Public Service, as a member of the Tier III Coalition for Wireless E911, has petitioned the Commission to forbear, until December 31, 2005, from enforcing the quantitative accuracy standards set forth in Section 20.18(h)(1) and (2) of the Rules.⁶

⁶ *Petition Pursuant to 47 U.S.C. §160(c) for Forbearance from E911 Accuracy Standards Imposed on Tier III Carriers for Locating Wireless Subscribers Under Rule Section 20.18(h),* WT Docket No. 02-377 (November 20, 2002).

III. Conclusion

As demonstrated above, notwithstanding the fact that the six-month implementation schedule has not been triggered by any E911 Phase II PSAP requests, the Companies have proceeded to explore all available E911 Phase II solutions. The Companies will continue to work, in a good faith effort, to meet its E911 obligations in a timely manner to the greatest extent feasible.

Respectfully Submitted,
Public Service Cellular, Inc.
Enterprise Wireless PCS, L.L.C.

Dated: August 1, 2003

/s/ Joshua P. Zeldis

Michael K. Kurtis

Joshua P. Zeldis

Their Attorneys

Kurtis & Associates, P.C.
1000 Potomac Street, N.W.
Suite 200
Washington, D.C. 20007
(202) 328-4500

AFFIDAVIT

STATE OF Georgia :
COUNTY OF Taylor : TO WIT:

I, Richard W. Bolt, am familiar with the facts as set forth in the forgoing Enhanced 911 (E911) Deployment and Implementation Status Report of Public Service Cellular, Inc. and Enterprise Wireless PCS, L.L.C. and declare, under penalty of perjury, that the facts as set forth therein are true, complete and correct to the best of my knowledge and belief.

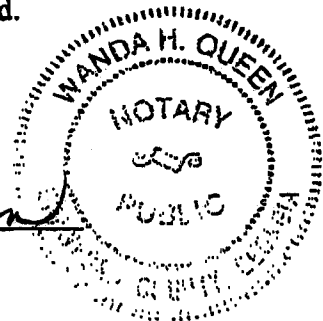
Richard W. Bolt

Name: Richard W. Bolt
Title: Director of Engineering & Network Operations
Public Service Cellular, Inc.

I hereby certify that on this 31st day of July, 2003, before me, the undersigned Notary Public of said State, personally appeared Richard W. Bolt, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he/she executed the same for the purposes therein contained.

WITNESS my hand and Notarial Seal.

Wanda H. Queen
Notary Public Wanda H. Queen



My Commission Expires: January 4, 2005